

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GIDEON RAPAPORT,

Plaintiff,

- vs. -

ABIGAIL FINKELMAN,

Defendant.

No.: 1:24-cv-05942 (JGLC)

**NOTICE OF DEFENDANT ABIGAIL FINKELMAN'S MOTION
FOR RULE 11 SANCTIONS AGAINST PLAINTIFF GIDEON RAPAPORT AND
PLAINTIFF'S FORMER COUNSEL
RICHARD A. ALTMAN AND THE LAW OFFICE OF RICHARD A. ALTMAN**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant's Motion for Rule 11 Sanctions Against Plaintiff Gideon Rapaport, Plaintiff's Former Counsel Richard A. Altman, and his firm the Law Office of Richard A. Altman, the annexed Declaration of Max Rodriguez and the exhibits thereto, and all the pleadings and proceedings herein, Defendant Abigail Finkelman, by and through her undersigned counsel, hereby moves this Court before the Honorable Jessica G.L. Clarke, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, Room 1040, New York NY 10007, for an order, pursuant to Federal Rule of Civil Procedure 11, ordering sanctions against Plaintiff Gideon Rapaport, his former counsel, Richard A. Altman, and the Law Office of Richard A. Altman, and requiring them to pay all of the attorneys' fees, costs, and other expenses that Defendants have incurred in defending against this action, as well as any other sanctions the Court deems appropriate. Defendant respectfully requests oral argument on this motion.

Dated: October 21, 2024
New York, New York

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